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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN DOE, *et al.*,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States of America, *et al.*,

Defendants.

Case No. 4:25-cv-03140 JSW

**SECOND STIPULATION TO EXTEND TIME
FOR DEFENDANTS' RESPONSE TO
PLAINTIFFS' COMPLAINT; AND
[PROPOSED] ORDER**

On June 18, 2025, the Court granted the parties' first stipulation to extend time for Defendants' response to Plaintiffs' complaint, setting a due date for Defendants' response to Plaintiffs' complaint as July 14, 2025. *See* Dkt. No. 73. The parties hereby stipulate to an additional extension of time for Defendants' response to Plaintiffs' complaint. Defendants will file their response on or before August 13, 2025. The parties make this request because Defendants are still in the process of conferring on how to proceed with this action. For these reasons, and as articulated below in Declaration of Counsel, the parties respectfully request that the Court grant their stipulation.

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1 Dated: July 11, 2025

Respectfully submitted,¹

2 CRAIG H. MISSAKIAN
3 United States Attorney

4 /s/ Elizabeth D. Kurlan
5 ELIZABETH D. KURLAN
6 Assistant United States Attorney
7 Attorneys for Defendants

8 Dated: July 11, 2025

9 /s/ Johnny Sinodis
10 JOHN N. SINODIS
11 ZACHARY NIGHTINGALE
12 Attorneys for Plaintiffs

13 **[PROPOSED] ORDER**

14 Pursuant to stipulation, IT IS SO ORDERED. Defendants will file their response to Plaintiffs'
15 complaint by August 13, 2025.

16 Date:

17 JEFFREY S. WHITE
18 United States District Judge
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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On June 18, 2025, the Court granted the parties' first stipulation to extend time for Defendants' response to Plaintiffs' complaint, setting a due date for Defendants' response to Plaintiffs' complaint as July 14, 2025. *See* Dkt. No. 73.

3. I have been in active discussions with the agency to determine how they want to proceed with this case, and they are still are in process of making their decision. I contacted Plaintiffs' counsel regarding Defendants' request for a further extension of time to prepare their response to the complaint, and Plaintiffs consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: July 11, 2025

/s/ Elizabeth D. Kurlan

ELIZABETH D. KURLAN

Assistant United States Attorney